

**From:** [Maria Martinez](#)  
**To:** [Mark Hansen](#)  
**Cc:** [R6\\_DWH\\_Info@epa.gov](mailto:R6_DWH_Info@epa.gov)  
**Subject:** Heads Up Fw: Ceasing reporting of H2S, LEL, O2, CO  
**Date:** 06/04/2010 05:49 PM

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FYI...

----- Forwarded by Maria Martinez/R6/USEPA/US on 06/04/2010 05:48 PM -----

**From:** Maria Martinez/R6/USEPA/US  
**To:** Christopher Ruhl/R6/USEPA/US@EPA  
**Cc:** Eric Delgado/R6/USEPA/US@EPA, Jon Rauscher/R6/USEPA/US@EPA, R6 DWH REOC PSC@EPA, R6\_DWH\_Info@epa.gov, Ruben Casso/R6/USEPA/US@EPA, Susan Webster/R6/USEPA/US@EPA  
**Date:** 06/04/2010 05:22 PM  
**Subject:** Re: Ceasing reporting of H2S, LEL, O2, CO

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Chris,

The Air Committee is made up of Regions 4 and 6's Air Program/Air Toxics Program staff and managers. It also includes OAQPS staff and management including Steve Page (Office Director), Richard (Chet) Wayland (Division Director), Beth Craig ( OAR Deputy Assistant Administrator) and Janet McCabe (OAR's Principal Deputy Assistant Administrator), the EOC, and OAR's Public Affairs staff.

As for accomplishing what we need: I need some assistance in putting together a strong draft paper. The paper needs to have the elements we talked about last week but it needs to provide detailed technical justification and chronology. I have the ERT paper but all the paper alludes to is information that was reviewed. It does not have specific citations/attachments of that documentation. For example:

- Citation for the BP data referenced in the ERT paper. Need more information on this one...assistance requested.
- Specific information/citation of the oil characteristics. Need more information on this one...assistance requested.
- Specific information/citation of the dispersant contents...to discount this being an H2S issue. I need a general reference for this one...assisted requested.
- EPA's H2S data - we can cover this since we have been reviewing it. This part will also have the history of the issue with the detection limit etc.
- Availability of TAGA or other response if concerns about H2S arise...we talked about this one and I have the information I need.
- Site description of the Venice sites. Need assistance with this one...assisted requested.
- Full description/information of the LDEQ stationary sites measuring H2S in Chalmette and Mereaux. I got this one.

Once I get some help with the above. I can finish putting the issue paper together, send the draft for the Air Committee for review and comment. With some assistance, we can try to accomplish this in less than a week's time. Note that we have gotten at least one control on the H2S issue so there is a lot of sensitivity on this especially since we had a rough start with the detection limits/calibration of the MultiRAE devices the first 3 weeks.

I cannot emphasize enough the need to orchestrate this so we have full support from OAR/OAQPS senior management. They are supportive of the step but they are requesting that we have a full history

and explanation before we cease.

Maria

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To: Maria Martinez/R6/USEPA/US@EPA  
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Date: 06/04/2010 04:49 PM  
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Maria-

I would like to learn more about this Air Committee and what our interaction is with it for the response. As far who you are working with, how can we help you accomplish what you need to and what is the timing for it? I had thought that you had previously indicated that we could stop H2S on 6/8. I wanted EU to put together a justification since that is routine during a response. I still want the EU to continue working on the justification because a necessary to communicate it to the USCG. We can make it available to you and perhaps you will want to use it in the white paper that you are developing.

Chris Ruhl  
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Federal On-Scene Coordinator  
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To: Christopher Ruhl/R6/USEPA/US@EPA  
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Date: 06/04/2010 04:19 PM  
Subject: Re: Ceasing reporting of H2S, LEL, O2, CO

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Chris,

I do not recommend ceasing the H2S monitoring at this time. I understand your rationale but OAR wants this step to be documented and coordinated through the Air Committee and EOC before ceasing the H2S monitoring.

We have started the issue paper that will lay out our exit strategy but we are not complete with it and it will still need to be vetted and coordinated with OAQPS, OAR and the EOC through the Air Committee.

Once again I understand your technical justification but we need to have this step be a coordinated and vetted process.

Maria

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From: Christopher Ruhl/R6/USEPA/US  
To: Eric Delgado/R6/USEPA/US@EPA, R6 DWH REOC PSC@EPA  
Cc: Maria Martinez/R6/USEPA/US@EPA, Susan Webster/R6/USEPA/US@EPA, Jon Rauscher/R6/USEPA/US@EPA  
Date: 06/04/2010 04:03 PM  
Subject: Ceasing reporting of H2S, LEL, O2, CO

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#### Planning/Environmental Unit

I visited with Jon Raucher and Maria Martinez earlier in the week about potentially stopping the monitoring for H2S. The primary reason for this is to move to the use of the mini rae systems. The mini rae system allows for constant data transfer which allows us to be more responsive to spikes of VOCs. The mini raes are currently operational and have been so for several days. I would like you review the data available to determine if the cessation of the H2S monitoring is appropriate. If it is we need to develop something that justify such an action. To accomplish this I would like you to look at least the following items at a minimum: discharged oil analysis for the presence of H2S, dispersant analysis for the presence of H2S and the history of data that we have recorded for the presence of H2S. One key characteristic of H2S is its odor. In the event that we get an odor complaint consistent with H2S we will maintain the capability to conduct mobile H2S monitoring. As well please review the data that we have and determine if we can discontinue the monitoring for O2, LEL, and CO. All three have exhibited normal reading as we would expect and I believe the data supports the discontinuing of it.

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